

PIG'S EYE LANDFILL  
RECORDS COMPILATIONS  
FORD MOTOR COMPANY

946843

DCN	DATE	AUTHOR	RECIPIENT	TITLE	SUMMARY	PRPS
01099	06/00/86			STATEMENT OF DONALD E. GRAMSE	A STATEMENT OF E. GRAMSE, WHO IS A DRIVER FOR WACOIN AND RESPONSE TO QUESTIONS ASKED BY REPRESENTATIVES OF MPCA. THE DOCUMENT STATES HE HAULED SEMI-SOLIDS FROM FORDMC AND THE WASTE WAS DUMPED IN THE SAME MANNER AS COMMERCIAL RUBBISH AT THE WDE LANDFILL. THE DOCUMENT STATES HE HAULED INDSTE SLUDGES TO PIG' EYE.	FORDMC, INDSTE, WACOIN
01346				MAILING ADDRESS LIST	A MAILING ADDRESS LIST OF PERSONS; THEIR TITLES, ADDRESSES, AND PHONE NUMBERS ARE LISTED.	WHIRLP, FORDMC
02158	09/15/93	CHERYL SMITH	NILE FELLOWS, MPCA	PIG'S EYE FILE AND RESEARCH SUMMARIES	A COMPILATION OF LISTS AND RESEARCH SUMMARIES CONCERNING PIG'S EYE DUMP. LISTS OF REQUEST FOR INFORMATION RECIPIENTS, PIG'S EYE FILES, MPCA ACTIVITIES TO DATE, HAULERS, POSSIBLE GENERATORS, AND RESEARCH TASKS ARE INCLUDED. ALSO INCLUDED IS A PIG'S EYE DUMP REVIEW.	PORTAU, COSTPA, MWCC, 3M, FORDMC
02387	07/27/73	C.J. STOFKO, FORDMC	JOHN C. LICHTER, MPCA	FORDMC, MPCA CORRESPONDENCE	A LETTER WHICH STATES WACOIN HAULS WASTE FOR FORDMC UNDER PERMIT NO. SW28, THE MATERIAL HAULED IS AS FOLLOWS: 58,000 GALLONS OF PAINT SLUDGE/YEAR; 1330-55 GALLON DRUMS OF WASTE GREASE, OILS, SOLVENTS PER YEAR. THE DOCUMENT ALSO INCLUDES A LETTER DATED 02/11/91 IN WHICH FORDMC REQUESTS DISCLOSURE INFORMATION FROM MPCA; A COPY OF MPCA'S REQUEST LETTER. THE RESPONSE STATES TO FORDMC'S KNOWLEDGE IT HAS	FORDMC, WACOIN, TWCWDS

PIG'S EYE LANDFILL  
RECORDS COMPILATIONS  
FORD MOTOR COMPANY

DCN	DATE	AUTHOR	RECIPIENT	TITLE	SUMMARY	PRPS
					NEVER DIRECTED WASTE TO PIG'S EYE; HOWEVER, THEIR CURRENT HAULER WACOIN WAS FORMERLY TWCWDS, AND A FORMER EMPLOYEE STATES PIG'S EYE MAY HAVE BEEN USED IN THE EARLY 60S.	
02441				HANDWRITTEN NOTES	HANDWRITTEN NOTES FROM SOLID WASTE FILES ADDRESS A PARTIAL CHRONOLOGY OF LAND USE DECISIONS. INCLUDED IS A PARTIAL LIST OF THE DUMP'S HISTORICAL EVENTS, IN BRIEF. PRINTOUTS OF FINANCIAL PROGRESS REPORTS FOR 01/93 ARE INCLUDED. A TELEPHONE LOG FORM 08/03/88 IS INCLUDED FROM REBECCA FLOOD OF METRO WASTE CONTROL COMM. REGARDING PRELIMINARY TESTING OF HAZARDOUS WASTE AND COMPLAINT INVESTIGATION. HARD COPY OF E-MAIL FROM NILE FELLOWS TO CHRY/SMITH REGARDING 3M IS INCLUDED. HANDWRITTEN NOTES GIVE DETAILS REGARDING DUMPING BY 3M AND FORDMC.	3M, FORDMC

STATE OF MINNESOTA  
OFFICE OF THE ATTORNEY GENERAL  
POLLUTION CONTROL DIVISION  
1935 WEST COUNTY ROAD B-2  
ROSEVILLE, MINNESOTA 55113

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In the matter of:

Waste Disposal Engineering Landfill,  
City of Andover, Anoka County, Minnesota  
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The Statement of DONALD E. GRAMSE, taken  
before Vicki G. Kasten, a Notary Public in and for the  
County of Koochiching, State of Minnesota, taken on the 9th  
day of June, 1986, at 1935 West County Road B-2, Roseville,  
Minnesota 55113, commencing at approximately 3:00 p.m.

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## APPEARANCES

DENNIS M. COYNE, SPECIAL ASSISTANT ATTORNEY GENERAL,  
Pollution Control Division, 1935 West County Road B-2,  
Roseville, Minnesota 55113, appeared for and on behalf of  
the Attorney General of the State of Minnesota.

STEVEN Z. KAPLAN, ESQUIRE, of the law firm of HART,  
BRUNER, O'BRIEN & THORNTON, 1221 Nicollet Mall, Suite 700,  
Minneapolis, Minnesota 55403, appeared for and on behalf of  
the Witness.

ROBERT E. FALSTAD, ASSISTANT COUNSEL, Sperry  
Corporation, Defense Products Group, Sperry Park, P. O. Box  
64525, St. Paul, Minnesota 55164-0525, appeared for and on  
behalf of SW-28 Group.

MICHAEL KLUTHO, LAW CLERK, appearing for JOHN  
ANDERSON, ESQUIRE, of the law firm of BASSFORD, HECKT,  
LOCKHART & MULLIN, P.A., 3550 Multifoods Tower,  
Minneapolis, Minnesota 55402, appeared for and on behalf of  
Onan.

ALSO PRESENT: Nancy N. Misra, Solid and Hazardous  
Waste Division, Minnesota Pollution Control Agency.

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1                    DONALD EMIL GRAMSE,  
2                    the Witness in the above-entitled  
3                    matter after having been first duly  
4                    sworn testifies as follows:

6                    EXAMINATION

7                    BY MR. COYNE:

8                    Q.        Would you state your full name for the record,  
9                    please.

10                  A.        Donald Emil Gramse.

11                  Q.        Mr. Gramse, I am Dennis Coyne and I represent  
12                  the State of Minnesota Pollution Control Agency and the  
13                  Attorney General's Office. We are investigating the Waste  
14                  Disposal Engineering Landfill located in Anoka County. In  
15                  the course of that investigation we have taken statements  
16                  from many witnesses, including now today your own. In the  
17                  course of the answers that you provide I would like you to  
18                  give an oral answer, one that can be heard, so that the  
19                  court reporter can take down your reply. In other words, a  
20                  nod of the head will not be able to be recorded, so if you  
21                  would always give a yes or a no or some other oral reply.  
22                  Will you try to do that today?

23                  A.        Sure.    Sure will.

24                  Q.        The other thing is if you don't understand a  
25                  question that I'm asking you, if you would say so and then

01103

1 I'll make an effort to make my question clear. Would you  
2 do that?

3 A. Sure.

4 Q. Mr. Gramse, you were served with a subpoena in  
5 this matter, were you not?

6 A. Yes.

7 Q. I'm showing you a copy of the subpoena and I'm  
8 asking you if you can recognize that? Is this a copy of  
9 the subpoena which was served?

10 A. I don't have this here.

11 Q. The third page of what will be marked as your  
12 Exhibit Number 1 is a copy completed by the sheriff's  
13 office showing the person on whom the subpoena was served  
14 and the date of the service.

15 A. Oh, yeah, the girlfriend -- girlfriend took it.  
16 I see her name here. Yes, sir.

17 MR. COYNE: I'd like this subpoena to  
18 be marked as Gramse Exhibit Number 1.

19 (At this time Gramse Statement Exhibit  
20 1 was marked for identification by the  
21 Court Reporter.)

22 MR. COYNE: Mr. Falstad, you have  
23 something you would like to say on the record?

24 MR. FALSTAD: Yes. I'd like to state  
25 that I'm an attorney representing the Sperry Corporation

1 which is one of the 12 parties that has entered into a  
2 consent order with the Minnesota Pollution Control Agency  
3 and Environmental Protection Agency. I'd like to state  
4 that I'm simply attending this statement. I'm not  
5 participating and will not be asking any questions.

6 MR. KLUTHO: Same here.

7 BY MR. COYNE:

8 Q. Mr. Gramse, the subpoena has your home as 711  
9 North Oak Drive in Vadnais Heights. Is that your home?

10 A. That's correct.

11 Q. The sheriff's service statement says that  
12 service was made on the 30th of May. Is that the  
13 approximate date of service?

14 A. I don't remember.

15 Q. After the service of the subpoena, did you  
16 speak with Ron Roth?

17 A. Just told him that when I got the subpoena  
18 that I'd like to have legal -- a guy come with me to, you  
19 know -- what's going on, you know; I don't understand it --  
20 and get some legal advice.

21 Q. And what did he tell you?

22 A. He just would get me a legal advice and go and  
23 answer the questions.

24 Q. And did he refer you to Mr. Thornton's office  
25 and to Mr. Kaplan?



1 A. Right.

2 Q. Did Mr. Roth offer to pay your legal fees then?

3 A. No.

4 MR. KAPLAN: Well, we'll object to any  
5 question dealing with payment of legal fees on the grounds  
6 it's irrelevant and privileged.

7 MR. COYNE: Was there an answer to the  
8 question that I asked the witness, the previous question?

9 (Whereupon the requested portion of the  
10 record was read by the Court Reporter.)

11 MR. KAPLAN: Well, I'll instruct the  
12 witness not to respond to the question for the grounds  
13 stated.

14 BY MR. COYNE:

15 Q. Mr. Gramse, there are occasions when a lawyer  
16 will object to a question and there are other occasions  
17 when he will not only object but will also direct the  
18 witness not to answer. The witness, of course, is free to  
19 answer or not and so in this situation, Mr. Kaplan has made  
20 an objection and directed you not to answer the question;  
21 however, you are free to answer the question or not. And  
22 so, in this situation, I'll ask a follow-up question which  
23 is: will you follow the advice of Counsel and not answer  
24 the question regarding payment of fees?

25 A. I'll just leave that up to my attorney.

1 Q. So you will follow his instruction?

2 A. Right.

3 Q. Now, in addition to speaking with Mr. Roth,  
4 did you speak to anyone else other than Mr. Thornton or Mr.  
5 Kaplan regarding your appearance here today?

6 A. No, sir.

7 Q. The subpoena, as you will note, Mr. Gramse,  
8 requires you to bring with you any documents that you may  
9 have and it details the kinds of documents that you should  
10 bring with you if you have them. And my question is  
11 whether you brought any documents with you today?

12 A. No, sir.

13 Q. Did you have any documents?

14 A. No, sir.

15 Q. Now, Mr. Gramse, you work for Waste Control  
16 today. Is that correct?

17 A. Yes.

18 Q. And their address is 95 Ivy Avenue West. Is  
19 that right?

20 A. Right.

21 Q. What kind of work do you do for Waste Control  
22 today?

23 A. I drive a -- what they call a Dino truck.  
24 It's a -- what do you call it -- just, you pick up these  
25 containers that go on a truck from various locations all

01107

1 the way around the Twin Cities. You know, you just get  
2 your paperwork in the morning and whatever company they  
3 give you, that's where you go, and take it to the landfill  
4 and take the box back to the company and go on to your next  
5 stop.

6 Q. The truck that you drive now is called a Dino  
7 truck or sometimes called a Dinosaur. Isn't that right?

8 A. Right.

9 Q. And is that a truck that compacts the waste?

10 A. No. No. That just hauls containers.

11 Q. Now, have you driven this Dino truck equipment  
12 for the last five years or so?

13 A. Yes, sir.

14 Q. Before that what sort of equipment did you  
15 drive?

16 A. I run a Dumpster.

17 Q. And the Dumpster has either a three to  
18 five-yard bucket, is that right, or an eight to ten-yard  
19 bucket?

20 A. Eight to ten-yard.

21 Q. So from time to time you'd carry a three to  
22 five-yard bucket and other times an eight to ten-yard  
23 bucket?

24 A. Yes, sir.

25 Q. When did you first begin to haul for Waste

1 Control or Berkman Iron and Scrap?

2 A. 1969 was when I started. I wasn't on Dumpster  
3 all the time. Once in awhile I'd work down in the junkyard  
4 and sort scrap for them and different things like that, and  
5 when somebody would call in sick, I'd go on a Dumpster now  
6 and then.

7 Q. So in 1969 you started work with Waste Control?

8 A. Waste Control.

9 Q. Now, prior to that time you had also worked  
10 with Berkman Iron and Scrap?

11 A. Berkman Iron and Metal, right.

12 Q. And what years was that?

13 A. I don't remember when they switched over from  
14 Berkman Iron to Waste Control. I believe when I come back  
15 in '69 was in with Waste Control. I don't remember if they  
16 still had the scrap yard going when I did come back in '69  
17 or not.

18 MR. COYNE: Let's just go off the  
19 record for a minute.

20 (At this time a discussion was held off the  
21 record.)

22 BY MR. COYNE:

23 Q. Mr. Gramse, while we've been off the record  
24 we've been summarizing your work experience and I'd like to  
25 go back then from the period from 1962 to 1967. What did

1 you do during that period?

2 A. From '62 to '67 I worked for Berkman Scrap  
3 Iron and Metal, at the Ford plant hauling cardboard to  
4 Waldorf Paper Company.

5 Q. And then what did you do from '62 to '67?

6 MR. KAPLAN: That was '62 to '67.

7 THE WITNESS: That was '62 to '67.

8 BY MR. COYNE:

9 Q. Sorry. '67 to '69?

10 A. I was self-employed.

11 Q. Now, what was the nature of the work that you  
12 did during that period while you were self-employed?

13 A. I run a truck for A & D Supergas for a little  
14 while and then I worked for Molin Concrete, and that was it.  
15 Then was two places I did work off and on.

16 Q. When you started work for Berkman Iron and  
17 Scrap in 1962, was that your first job?

18 A. That was my first job, yes.

19 Q. And before 1962 had you been going to school?

20 A. Right.

21 Q. And did you graduate high school?

m111

22

23 Q. What was your last year completed?

24 A. 11th.

25 Q. I want to talk about the period from 1962 to

1 1967. And during that period you've mentioned the Ford  
2 plant?

3 A. Um-hmm.

4 Q. That's a yes or no, if you can?

5 A. Yes.

6 Q. And you said that you hauled cardboard and  
7 scrap? Is that right?

8 A. Just cardboard.

9 Q. What kind of equipment did you use?

10 A. We had three Ford dump trucks. We loaded and  
11 hauled them to Waldorf.

12 Q. Did you go to any other account in addition to  
13 the Ford plant during that period?

14 A. No.

15 Q. Then beginning in 1967 you worked with Waste  
16 Control?

17 A. Waste Control.

18 Q. And what kind of equipment did you use during  
19 that period?

20 A. To start, I worked in the scrap yard for John  
21 Berkman and I'd go on a Dumpster truck when somebody would  
22 call in sick or something, to start out with, and haul a  
23 few loads a week here and there.

24 Q. And from time to time did you haul waste to  
25 the Waste Disposal Engineering Landfill in Anoka County?

01111

1 A. Yes, sir.

2 Q. Just to go back a minute. This period was  
3 from 1969, was it, to the present when you worked with  
4 Waste Control?

5 A. Yes, sir.

6 Q. Can you recall some of the accounts whose  
7 waste you did haul to the Waste Disposal Engineering  
8 Landfill in Anoka County?

9 A. Oh, Ford Motor Company and Onan. And then it  
10 was various construction material from accounts.

11 Q. Let's begin first with the Ford account. What  
12 was the nature of the waste that you picked up from the  
13 Ford account?

14 A. It was semi-solid material from their paint  
15 booths and things like that. It was just scrapings that  
16 they scraped off of their paint booth and stuff that they  
17 loaded into this container that was dumped up in the  
18 landfill.

19 Q. What kind of containers were used to contain  
20 these semi-solids?

21 A. It was solid container with a slanted back  
22 that sat on a -- on a truck so to make sure that if it  
23 rained or something nothing would leak out or nothing.

24 Q. Does this kind of a container have a name to  
25 it?

01112

1 A. Just Dumpster.

2 Q. Now, what was the capacity of the Dumpsters  
3 that were used?

4 A. These out at the Ford plant was five yards.

5 Q. Were you the only one who picked up Ford Motor  
6 waste?

7 A. I don't know.

8 Q. Approximately how often during a week would  
9 you pick up from the Ford Motor account?

10 A. It ranged. Every week was different. It went  
11 on records and I have no way of knowing how much or how  
12 many times.

13 Q. Were there weeks when you did not pick up at  
14 all from the Ford account?

15 A. I believe so.

16 Q. And were there also weeks where you would pick up  
17 more than once during the week?

18 A. Yes.

19 MR. COYNE: Let's go off the  
20 record for a minute.

21 (At this time a discussion was held off the  
22 record.)

23 BY MR. COYNE:

24 Q. Mr. Gramse, while we've been off the record we  
25 have discussed the frequency of collection at the Ford



01113

1 plant with regard to these semi-solids that you have  
2 described. Is it a correct statement that some weeks you  
3 would pick up one five-yard Dumpster at the Ford plant?

4 A. Yes.

5 Q. And is it also true that other weeks you might  
6 not pick up anything at the Ford plant?

7 A. Yes.

8 Q. And is it also true that other weeks you would  
9 pick up more than one five-yard Dumpster of these  
10 semi-solids from the Ford plant?

11 A. Yes.

12 Q. The semi-solids that you have described were  
13 contained in this five-yard Dumpster. Is that correct?

14 A. Yes.

15 Q. How were they placed in the Dumpster?

16 A. It -- I don't know. When I went to the Ford  
17 plant it was already loaded and it would just come out in  
18 one big pile like a big pile of clay that was just a little  
19 soft but solid. It didn't run all over or nothing or that  
20 matter.

21 Q. So the semi-solids were loose in the five-yard  
22 Dumpster?

23 A. Not considered loose. It would come out in  
24 one big hunk like sticky clay or similar to that.

25 Q. Did the semi-solids have a smell?

01114

1 A. No, sir.

2 Q. Was there any color that they typically had?

3 A. No, sir.

4 Q. Now, these five-yard Dumpster loads of the  
5 semi-solids were taken to the Waste Disposal Engineering  
6 Landfill, were they?

7 A. Yes, sir.

8 Q. Describe what happened when you rolled in the  
9 WDE site in Anoka County, just step-by-step.

10 A. We'd pull through the gate, drive up to the  
11 window and sign your name and how many yards you had on and  
12 pull into the -- where they were dumping at the landfill  
13 site that day and dump your load and drive out.

14 Q. Were you directed to where to go to make the  
15 dump?

16 A. They directed us to the spot that they were  
17 dumping at that day.

18 Q. And who would give you those directions at the  
19 landfill?

20 A. Whoever was in the office window.

21 Q. Did you happen to know or know the name Red?

22 A. I know the name Red.

23 Q. Was there a fellow at the landfill who was  
24 referred to as Red?

25 A. Red, yeah. Yes.

01115

1 Q. Do you recognize the name Red St. Aoro?

2 A. No.

3 Q. Did this fellow who went by the name Red  
4 sometimes give you directions where to go?

5 A. Yes.

6 Q. Did he often give you the directions where to  
7 go?

8 A. No. It usually had office girl in the window.

9 Q. You know Ron Roth, don't you?

10 A. Yes.

11 Q. Did you sometimes see him at the landfill?

12 A. Yes.

13 Q. What did he do at the landfill on the  
14 occasions that you were there?

15 A. I have no idea. I just have seen him up there  
16 and we never talked, or very seldom have talked, if I did  
17 see him up there, unless he had some question to know where  
18 I was going next or what I had to do next.

19 Q. Did Ron Roth sometimes give you directions  
20 where to take your load?

21 A. Yes.

22 Q. In the same manner as Red would?

23 A. Yes.

24 Q. When you took your loads and dumped them you  
25 said that was in areas of landfill being worked that day?

01116

1 Is that right?

2 A. Yes.

3 Q. What kind of material was being dumped in the  
4 area where you were directed to dump?

5 A. It was commercial rubbish.

6 Q. Were you sometimes told to wait at the gate  
7 until other trucks were in a position or were you just  
8 directed to join other trucks that were dumping in the area?

9 A. You'd just drive in and wait your turn, wait  
10 to get up to the window to sign in and then just wait till  
11 they had room for you to back up next to the -- after they  
12 pushed it, the one that was left.

13 Q. Were other trucks dumping at the same time in  
14 the same area as you were dumping?

15 A. Yes.

16 Q. Was any special effort made to cover these  
17 semi-solids that you were bringing -- these semi-solids  
18 that you were taking into the landfill from Ford ahead of  
19 the wastes that were being deposited there by others?

20 A. No.

21 Q. So as far as you were concerned this waste  
22 that you were bringing in was just being landfilled like  
23 other commercial rubbish being dumped there?

24 A. Yes.

25 Q. Are you aware that there was an area at the

01117

1 landfill that was referred to as a hazardous waste pit?

2 A. Yes.

3 Q. And how did you learn about that?

4 A. Just when you drove in by the office you could  
5 see them putting these barrels, stacking these barrels into  
6 the pit at the right and I just asked a few questions what --  
7 what it was and they said that's where it was  
8 state-inspected for -- for liquid material, put in barrels.

9 Q. Were you ever directed to use the pit?

10 A. No.

11 Q. You mentioned that you saw Ron Roth from time  
12 to time at the WDE Landfill. Is that right?

13 A. Yes.

14 Q. Where did you first meet Mr. Roth?

15 A. When I worked for Waste Control and Joe  
16 Polansky sold him the business.

17 Q. Approximately what year would that be?

18 A. Possibly '71, '72.

19 Q. Is he the one who hired you to work for Waste  
20 Control when you went to work there in '69?

21 A. No.

22 Q. Who hired you then?

23 A. Joe Polansky. We just went along with the  
24 business.

25 Q. Referring to Mr. Roth?

0111B

1 A. Right.

2 Q. Approximately over the years that you hauled  
3 the Ford account and transported these buckets of  
4 semi-solids, approximately how many loads did you take to  
5 the WDE Landfill from the Ford account?

6 A. In how long of a stretch of time?

7 Q. Well, you can answer the question as best you  
8 can. If you want to take it a number of years or the whole  
9 period of years.

10 A. I just have no way of knowing how to come with  
11 an answer with that. There's just no way of telling. I  
12 just can't remember back that far and how many loads were  
13 hauled.

14 MR. COYNE: Let's go off the record for  
15 a minute.

16 (At this time a discussion was held off the  
17 record.)

18 BY MR. COYNE:

19 Q. While we've been off the record you and I have  
20 discussed the number of loads that you picked up from the  
21 Ford account and deposited at the Waste Disposal  
22 Engineering Landfill and you've supplied to me how it is  
23 that you're unable to estimate the number of loads. My  
24 question is would you summarize those reasons for the  
25 record?

01119

1           A.     Well, I worked in the scrap yard and then go  
2 out to the Ford plant just once in awhile when they called  
3 to haul a load. And then I'd go back to the scrap yard and  
4 sometimes they'd go once a week and sometimes they'd go  
5 once every two weeks or -- there's just no way of telling  
6 how many loads have been hauled.

7           Q.     In addition to the Ford account, you mentioned  
8 that you sometimes also hauled waste from the Onan Company  
9 to the Waste Disposal Engineering Landfill. Is that right?

10          A.     Yes.

11          Q.     Did you begin hauling this account sometime  
12 after 1969?

13          A.     I believe so.

14          Q.     And what was the nature of the waste that you  
15 hauled for the Onan account?

16          A.     It was the same contents as Ford, from their  
17 paint booths and material like that.

18          Q.     Did you also use five-yard Dumpsters?

19          A.     Three-yard Dumpster.

20          Q.     Would you describe for us typically what would  
21 happen when you went to pick up at the Onan account, who  
22 you saw, what directions you received and then what you did  
23 with the waste.

24          A.     You'd pull in the Onan account and I'd back up  
25 to the container and load it on the truck and go in the

01120

1 office and whoever was working in the office would sign a  
2 slip saying one Dumpster load of sludge, and you'd go back  
3 to your truck, and took it out to Andover Landfill.

4 Q. And by Andover Landfill you mean the Waste  
5 Disposal?

6 A. Waste Disposal Landfill.

7 Q. And what typically would happen then when  
8 you'd roll up to the gate at the WDE Landfill?

9 A. You'd sign in and they would direct you to  
10 where they were dumping that day, and dump your load and  
11 drive out.

12 Q. So you'd follow the same procedure for the  
13 Onan waste as you did for the Ford waste with regard to how  
14 you dumped it at the Waste Disposal Landfill?

15 A. Yes.

16 Q. Did you ever dump the sludge at the hazardous  
17 waste pit?

18 A. No.

19 Q. Can you estimate the number of three-yard  
20 Dumpsters from the Onan account that were taken to the WDE  
21 Landfill over the years?

22 A. No.

23 Q. And is that for the same reasons generally?

24 A. Same.

25 Q. As you just described with regard to the Ford



01121

1 account?

2 A. Yes.

3 Q. Over what time period did you sometimes haul  
4 the Onan account?

5 A. I really can't remember.

6 Q. Do you recall the last time that you hauled  
7 from the Onan account?

8 A. NO.

9 Q. In an effort to assist witnesses in their  
10 efforts to recall the accounts that they picked up from  
11 over the years, we have prepared a list of companies. And  
12 what I'm going to ask you to do is to check off beside the  
13 name of the company those companies that you recall picking  
14 up wastes and then transporting the waste to the WDE  
15 Landfill in Anoka County. I'm going to ask the court  
16 reporter to mark this as the Gramse Statement Exhibit  
17 Number 2, and then we'll give it to you and you can review  
18 the list if you would, and check mark those names as I've  
19 indicated.

20 (At this time Gramse Statement Exhibit  
21 2 was marked for identification by the  
22 Court Reporter.)

23 THE WITNESS: I guess the Ford Motor  
24 Company and Forman Ford Paints. Industrial Steel Container.  
25 I have hauled that one? Onan Corporation. The Rausch

01122

1 Manufacturing. That's all I can remember.

2 BY MR. COYNE:

3 Q. On the exhibit would you read off those that  
4 you have check marked now as companies from which you have  
5 collected waste for transport to the WDE site?

6 A. Okay. The Ford paints.

7 Q. And by that you mean the Forman Ford Paints?

8 A. The Forman Ford Paints.

9 Q. You also picked up from the Ford Motor Company?

10 A. Well, that Forman Ford Paints, ain't that the  
11 same as Ford Motor Company? I thought the Forman Ford  
12 Paint would be the paint side by the Ford Motor Company.

13 Q. Let me ask you this. Do you recall the  
14 approximate location of the Ford plant where you made the  
15 pickup?

16 A. They had changed it around different times,  
17 never was in the same place. Sometimes it was in the  
18 building, and sometimes they had it out behind the building.

19 Q. Do you know where the plant, though, itself is  
20 located?

21 A. Right.

22 Q. And where is that?

23 A. To start with you'd come through the gate and  
24 it would be in the, I believe it was Number 5 or 6 door,  
25 you'd back into to pick it up. It's been there to start

01123

1 with. And then from there they'd be adding on and adding  
2 on and every time they added on they'd move it.

3 Q. Is this the Ford plant?

4 A. Ford plant.

5 Q. And the plant is located on the Ford Parkway?

6 A. Ford Parkway.

7 Q. In St. Paul?

8 A. St. Paul.

9 MR. COYNE: Let's just go off the  
10 record for a minute.

11 (At this time a discussion was held off the  
12 record.)

13 BY MR. COYNE:

14 Q. While we've been off the record we've talked  
15 about where it is that you picked up the sludges from the  
16 Ford account and you have advised me that the sludges were  
17 picked up where the Ford Motor Company makes trucks and  
18 cars alongside the Ford Parkway in St. Paul. Is that right?

19 A. Yes.

20 Q. Now, when you talked about the Ford account,  
21 you talked about the Dumpster loads. Do you recall that?

22 A. Yes.

23 Q. Did you ever pick up waste in pails from the  
24 Ford account?

25 A. No.

01124

1 Q. Or buckets?

2 A. No.

3 Q. Or 55-gallon drums?

4 A. No.

5 Q. Do you know if ever anybody else did?

6 A. No.

7 Q. In addition to the Ford account what other  
8 accounts have you check marked on your Statement Exhibit  
9 Number 2?

10 A. Industrial Steel Container, Onan Corporation,  
11 and Rausch Manufacturing.

12 Q. Let's turn our attention to Industrial Steel  
13 Container. What did you pick up from Industrial Steel  
14 Container?

15 A. It was three-yard Dumpster that we hauled to  
16 Pigs Eye Landfill.

17 Q. And what was in the three-yard Dumpsters that  
18 you --

19 A. It was the same material as Ford and Onan had.

20 Q. By that do you mean paint sludges?

21 A. Paint. It was paint sludges that they burnt  
22 off of barrels and stuff that went in the container.

23 Q. Did you ever transport these paint sludges to  
24 the WDE Landfill?

25 A. Industrial Steel has never went to that, no.

01125

1 Q. When you say that Industrial Steel never went  
2 to the WDE Landfill, is it correct that they would direct  
3 you where to take their paint sludges for disposal?

4 A. Yes.

5 Q. And they directed you to take it to Pigs Eye?

6 A. Pigs Eye.

7 MR. KAPLAN: Who is the they?

8 THE WITNESS: Ron Roth or whoever was  
9 in the office.

10 BY MR. COYNE:

11 Q. When you got your assignment, that is the  
12 location to pick up the wastes, were you at the same time  
13 given direction as to where to take the waste after you  
14 picked it up?

15 A. Yes.

16 Q. And would Ron Roth often be the one to give  
17 you assignments?

18 A. No.

19 Q. But he sometimes did so?

20 A. Sometimes he'd be in the office when the  
21 dispatcher didn't show up or something like this or had to  
22 go somewhere, then Ron would take over the calls.

23 Q. Over the years when you worked for Waste  
24 Control from 1969 to present, who has filled the position  
25 of dispatcher at the company?

01125

1 A. There has been many.

2 Q. Can you recall some of those names?

3 A. Oh, golly, no.

4 Q. Is the fellow who does it currently someone  
5 that you know and can identify for the record?

6 A. The person in the office now has only been  
7 there a few months.

8 Q. Before that do you know who was in the  
9 position of dispatcher?

10 A. I can't remember. Nobody has lasted long.  
11 It's just been a driver gets hurt, he goes in the office to --  
12 the person in the office right now was hurt on the job and  
13 he's dispatching and there has been a Lee Hart was hurt on  
14 the job and he was dispatching for awhile. And Dave  
15 Aspinol has dispatched, and a lot of them guys. I just  
16 can't remember every --

17 Q. I have a list which is a partial list of some  
18 Waste Control employees and I'd like the court reporter to  
19 mark this list as the Statement Exhibit Number 3, and then  
20 I'll hand it to you and ask you if you recognize some of  
21 the people whose name is on this list as taking on the  
22 dispatcher job from time to time.

23 (At this time Gramse Statement Exhibit  
24 3 was marked for identification by the  
25 Court Reporter.)

01127

1 THE WITNESS: Mark Linscheid is in the  
2 office now.

3 BY MR. COYNE:

4 Q. What number does he have on there?

5 A. Number 13. Steve Schultz has dispatched.

6 Q. And what --

7 A. 27. Just them two on this list here.

8 Q. The last one that you mentioned was Steven  
9 Schultz?

10 A. Yes.

11 Q. Do you know approximately when he dispatched?

12 A. He's dispatching right now I believe.

13 Q. And the other name you mentioned was?

14 A. Mark Linscheid, right here.

15 Q. Number 13?

16 A. Number 13.

17 Q. Do you know approximately the years when he  
18 dispatched?

19 A. I believe he's only been there nine months.

20 Q. In addition to the three-yard Dumpsters picked  
21 up at Industrial Steel, did they ever provide other  
22 containers for wastes in addition to the three-yard  
23 Dumpsters?

24 A. They had loads of steel that we used to bring  
25 to the scrap yard.

01128

1 Q. Any 55-gallon drums?

2 A. No.

3 Q. Or pails?

4 A. No.

5 Q. Were empty drums ever transported from the WDE  
6 Landfill to Industrial Steel offices?

7 A. Not to my knowledge.

8 Q. Now, you mentioned the Onan account earlier  
9 this afternoon.

10 A. Yes.

11 Q. And you mentioned the transport of the  
12 Dumpsters with paint sludge. Do you recall that?

13 A. Yes.

14 Q. And my question is whether other containers  
15 were sometimes picked up by you, that is for example,  
16 55-gallon drums?

17 A. No.

18 Q. Or pails?

19 A. No.

20 Q. So it is a correct statement that the only  
21 containers that you picked up with the paint sludge were  
22 the Dumpster units?

23 A. Yes.

24 Q. Now, you've just described that the paint  
25 sludge from Industrial Steel went to Pigs Eye and that the



1 paint sludges from Ford and Onan went to the Waste Disposal  
2 site. Is that correct?

3 A. Yes.

4 Q. How did the dispatcher determine that the  
5 waste should go in some instances to one location for  
6 disposal and other instances to another location?

7 A. Well, when I took Ford up to the landfill,  
8 north landfill, if we had Onan, that was on the way coming  
9 back to take Onan up there too and then go back to Ford.  
10 Otherwise, the Ford Motor would go to Pigs Eye if Onan  
11 wouldn't go the same day.

12 MR. COYNE: Would you read back the  
13 last answer, please.

14 (Whereupon the requested portion of the  
15 record was read by the Court Reporter.)

16 BY MR. COYNE:

17 Q. Did you ever transport the paint sludges from  
18 Ford to Pigs Eye?

19 A. Yes.

20 Q. And is it correct that when you were hauling  
21 the Ford and Onan accounts on the same day you would take  
22 both accounts to the WDE Landfill?

23 A. Yes.

24 Q. At other times if you did not pick up the Onan  
25 account and only took the Ford account would you take the

01130

1 Ford account to Pigs Eye?

2 A. Yes.

3 Q. Did the Onan account ever go to Pigs Eye?

4 A. No.

5 Q. Was the Ford account closer so Pigs Eye than  
6 it was to WDE?

7 A. Yes. And it was closer to take Ford up to the  
8 north landfill if you were going to Onan at the same time.

9 Q. You've also check marked Rausch Manufacturing  
10 on the second page of Exhibit Number 2. Is that right?

11 A. Right.

12 Q. And what material did you pick up from the  
13 Rausch account?

14 A. That was like a silica sand and little water.

15 Q. And what kind of container was used to  
16 transport this material?

17 A. The same type of container as Ford and Onan.

18 Q. And the capacity?

19 A. Five yards.

20 Q. Five-yard Dumpsters?

21 A. Dumpster.

22 Q. And where did this material go?

23 A. That went to north landfill and Pigs Eye too.

24 Q. And by north landfill you mean the WDE?

25 A. WDE.

1           Q.     Typically when you took  
2     the WDE Landfill would you describe the  
3     you'd go through for disposal once you are  
4     Landfill?

5           A.     You'd pull through the gate, pull  
6     window, sign in and they'd direct you to where to  
7     dumping at that day and dump your load and go back  
8     company.

9           Q.     Did you ever dump these loads in the hazardous  
10    waste pit?

11          A.     No.

12          Q.     Did the silica sand have an odor to it?

13          A.     No.

14          Q.     Did it have a color?

15          A.     White.

16          Q.     What was its consistency?

17          A.     It was -- they made molds out of it to -- for  
18    die castings and material and it was just to hold -- a mold  
19    to hold the die cast together to different shapes and form.

20          Q.     When you unloaded the Dumpster at the landfill  
21    did it pour out like sand does?

22          A.     It was a dryer material, yes.

23          Q.     A dryer material than the paint sludges?

24          A.     No, about the same. Once in awhile it would  
25    stick. You'd have to take a shovel and shovel it out. It

01132

1 would cake up.

2 Q. Can you estimate the number of times that you  
3 transported these five-yard Dumpsters from the Rausch  
4 account to the WDE Landfill?

5 A. That went five days a week pretty steady.

6 Q. On a typical day how many Dumpsters would be  
7 transported?

8 A. One a day.

9 Q. Did you haul this account then every day?

10 A. Yes.

11 Q. Did others also from time to time service this  
12 account?

13 A. Yes, when I was on vacation and different  
14 times they had me doing something else, yes.

15 Q. Did this account only go to the WDE Landfill?

16 A. That went to Pigs Eye and different places too.

17 Q. How is it that it sometimes went to other  
18 places other than the WDE Landfill?

19 A. It was up to the office to dispatch where they --  
20 what side of town they wanted you to go in case they had a  
21 construction load up north or wherever your next load would  
22 have been.

23 Q. Is it correct that the office then made the  
24 decisions where the waste would be taken for disposal?

25 A. Yes.

01133

1 Q. As you look through this list which is Exhibit  
2 Number 2, are there other companies or locations from which  
3 you transported waste to the WDE Landfill?

4 A. No.

5 Q. You'll notice on the first page of the exhibit  
6 there is reference to Federal Cartridge Corporation. That  
7 is the Twin Cities Army Ammunition Plant. Did you  
8 sometimes pick up wastes at the Twin Cities Army Ammunition  
9 Plant?

10 A. No.

11 Q. In addition to this list of companies and  
12 people who are set out on Exhibit Number 2, are there other  
13 accounts from which you transported waste to WDE Landfill  
14 in Anoka County? Locations, companies or people that are  
15 not on this list?

16 A. No.

17 MR. KAPLAN: Could I have your question  
18 one more time, Dennis? I'm sorry.

19 BY MR. COYNE:

20 Q. Maybe I can say it a bit more clearly. You  
21 have testified that insofar as people and companies are  
22 named on Exhibit Number 2, you check marked the ones from  
23 which you picked up waste and took the waste to WDE.

24 A. Right.

25 Q. My question is are there companies or people

01134

1 or locations from which you picked up wastes, took it to  
2 WDE landfill which are not on our list, Exhibit Number 2?

3 A. Not to my knowledge.

4 Q. One of the companies on this list is the Foley  
5 Manufacturing Company. Did you ever pick up any wastes at  
6 Foley?

7 A. No.

8 Q. Have you ever in the course of your years of  
9 employment picked up barreled wastes and transported them  
10 to a landfill for disposal?

11 A. No.

12 Q. Did others working for Waste Control sometimes  
13 transport barreled wastes for disposal?

14 A. Yes.

15 Q. As you look at, for example, Exhibit Number 3,  
16 can you identify some people who you know did transport  
17 liquid waste for disposal?

18 A. I really don't remember anybody who did do it.  
19 I just seen drums up to north landfill that they were  
20 putting in the pit. I don't know who hauled them up there  
21 or where they come from.

22 Q. When you observed the pit, what did you  
23 observe? What was going on in those times when you saw the  
24 pit and the activities?

25 A. They had a truck with a boom on it that they

01135

1 had a strap around the barrels and set them on -- one on  
2 top of another and cover them with sand, I believe it was,  
3 or they had -- the state inspectors were there watching the --  
4 the situation, what was being put in and how it was handled.

5 Q. How do you know that state inspectors were out  
6 there?

7 A. They had "State of Minnesota" on the car doors.

8 Q. So you saw some State of Minnesota vehicles  
9 from time to time?

10 A. Time out there, yes.

11 Q. Did you ever see 55-gallon drums at the WDE  
12 site at locations other than alongside the pit or in the  
13 pit?

14 A. No.

15 Q. Did Waste Control ever operate a transfer  
16 station?

17 A. Not to my knowledge.

18 Q. You know what a transfer station is?

19 A. To dump garbage in one place and haul it out.  
20 Not to my knowledge.

21 Q. Have other drivers for Waste Control been to  
22 the WDE Landfill in addition to yourself?

23 A. Yes.

24 Q. And who are among those that you're aware of  
25 as having been out at the WDE site?

01136

1 A. John Bolin, I believe.

2 Q. Now, you're referring to the list of people,  
3 for example, on Exhibit 3, right?

4 A. Right.

5 Q. And John Bolin is Number 7 on that list, is he?

6 A. Yes. I don't know some of these guys here.  
7 That's the only one really that I recognize that I have  
8 seen up there.

9 Q. Now, how do you place John Bolin at the WDE  
10 site?

11 A. I really don't know. He hauled these 40-yard  
12 packer boxes. Where they come from, I don't know, or --

13 Q. When you saw John Bolin at the WDE site, you  
14 saw him with a 40-yard --

15 A. Packer box.

16 Q. Did you ever see him transporting drums?

17 A. No.

18 Q. In addition to John Bolin, do you recall  
19 seeing any other Waste Control driver at the WDE Landfill?

20 A. Not right offhand. We all have been there,  
21 but like I say, I didn't get there every day and know  
22 everybody that has been up there.

23 Q. What I'd like to do is get a description as  
24 complete as we can of the paperwork that was involved with  
25 the disposal of waste. Can you describe for us from the



01137

1 beginning through the end what was the nature of the  
2 paperwork that was used when wastes were disposed of?

3 A. It was a tablet form paper with lines on it  
4 where you'd sign your name and how many yards you had. And  
5 that was it.

6 Q. Were you given this tablet information when  
7 you reported to the dispatcher?

8 A. No. That would come from the landfill. You  
9 report to the landfill window and get this sheet of -- you  
10 get the tablet and you sign your name and how many yards  
11 you had and then you'd hand it back in the window.

12 Q. So that paperwork was completed at the  
13 landfill?

14 A. At the landfill.

15 Q. Did you keep a copy of the paperwork that you  
16 completed at the landfill?

17 A. No.

18 Q. When you got your assignments from the  
19 dispatcher did you have any kind of paper then?

20 A. You just have a slip of paper with the  
21 companies on it and some days you'd get one load, some days  
22 you get two and then when you'd get that done you'd call in.

23 Q. The paper that you were sometimes given by the  
24 dispatcher, did that have the place where other wastes were  
25 supposed to be transported?

01138

1 A. Yes.

2 Q. Did you hand in any paper back to the  
3 dispatcher or back to the Waste Control company?

4 A. You'd have a Waste Control book and you'd have  
5 your receipts, daily receipts.

6 Q. And by receipts, what do you mean?

7 A. From the companies that signed that you have  
8 hauled the loads.

9 Q. What information was in the Waste Control book?

10 A. It just had the company's name, address, and  
11 then they would have the telephone number and then you'd  
12 just write in there whatever you hauled, how many yards you  
13 hauled and you'd get a signature from the company you  
14 hauled it from.

15 Q. Would that be the receipt you referred to?

16 A. The receipt you hand in. That was the only  
17 paperwork that was handed in.

18 Q. Is it the same kind of paperwork that you go  
19 through today?

20 A. Yes, sir.

21 MR. COYNE: I'd like to take just a  
22 brief break and we'll finish up.

23 (At this time a brief recess was taken.)

24 BY MR. COYNE:

25 Q. Mr. Gramse, is there any part of your

01139

1 statement that you've given this afternoon which you would  
2 like to clarify or correct?

3 A. No.

4 Q. You have the opportunity to read and sign the  
5 transcript. You may also waive the reading and the signing.  
6 Have you made a decision in that regard?

7 A. I'll just waive it.

8 MR. COYNE: Thank you for appearing  
9 today in response to the subpoena that was issued to you.

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01140

STATE OF MINNESOTA                    )  
  )       SS.  
COUNTY OF KOOCHICHING            )

Be it known that I took the statement of DONALD EMIL GRAMSE, on the 9th day of June, 1986, at Roseville, Minnesota;

That I was then and there a Notary Public in and for the County of Koochiching, State of Minnesota, and that by virtue thereof, I was duly authorized to administer an oath;

That the witness before testifying was by me first  
duly sworn to testify the whole truth and nothing but the  
truth relative to said cause;

That the testimony of said witness was recorded in Stenotype by myself and transcribed into typewriting under my direction, and that the statement is a true record of the testimony given by the witness to the best of my ability;

That the reading and signing of the deposition by the witness and the Notice of Filing were waived.

WITNESS MY HAND AND SEAL this 17th day of June,  
1986.

Vicki G. Kasten  
Court Reporter

**(MAILING ADDRESSES)**

01346

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10/15/90

NOTE: All mailings to Directors are coordinated through the  
Corporate Secretary's office (Daniel Hopp).

To: Nile Fellows  
From: Cheryl Smith  
Re: Pig's Eye Dump Summary  
Date: September 15, 1993

Attached are copies of the summaries I have prepared for EPA on the Pig's Eye Dump site. I have provided a list of site specific files that have been created. I have placed these specific files into two boxes. Please let me know whether you want me to do additional tasks.

CC Cliff Anderson

**REQUEST FOR INFORMATION RECIPIENTS**

The following parties have been send Requests for Information. Parties will an asterisk after its name did not respond to the request.

ACE SOLID WASTE MANAGEMENT  
ACTION DISPOSAL  
BELLAIRE SANITATION \*  
CAPITOL CITY DISPOSAL \*  
CASANOVA BROTHERS \*  
ED'S TRUCKING  
FORD MOTOR COMPANY  
HAUL-A-WAY SYSTEMS  
HIGHLAND PARK SANITATION  
JOHNNY'S RUBBISH HAULING \*  
KOWSKI DISPOSAL  
KRUPENNY & SONS DISPOSAL  
METROPOLITAN WASTE CONTROL COMMISSION  
MICKEY'S CITY WIDE RUBBISH  
MUDEK DISPOSAL  
PLANT BROTHERS  
RAILROADS, INCLUDING BURLINGTON NORTHERN, MILWAUKEE, SOO LINE, AND  
CORPORATE SUCCESSORS  
RED ARROW  
REMACKEL \*  
ST. PAUL, CITY OF  
ST. PAUL PORT AUTHORITY  
THOMAS, CAREY \*  
3M  
TWIN CITY REFUSE AND RECYCLING  
TWIN CITY SANITATION  
WALTER'S RUBBISH  
WASTE CONTROL \*  
WHIRLPOOL  
WYNNE'S RUBBISH

Separate files have been set up for parties who to date have not been contacted but should be contacted based on the information contained in the files.

## PIG'S EYE FILES\*

## DOCUMENT REQUESTS

FISH HATCHERY - Dump located next to Pig's Eye Dump

## GENERAL

HAULER LISTS - Lists of licensed haulers.

HAULER AGREEMENTS - Agreements haulers had with the City of St. Paul to haul nonresident waste to the site.

HISTORICAL RESEARCH - Research done at Minnesota Historical Society.

## MAPS

## MEETING MINUTES

## POSSIBLE GENERATORS

## RECORD COLLECTION

## RETURNED REQUESTS FOR INFORMATION

ST. PAUL, CITY OF, GENERAL

ST. PAUL, CITY OF, RESEARCH

ST. PAUL, CITY OF, PERSONNEL SURVEY

ST. PAUL, CITY OF, RECORDS - Records copied from City of St. Paul Solid Wastes files.

SOLID WASTE FILE ON PIG'S EYE - MPCA GWSW file on site. Includes maps and inspection reports.

TABLES/FIGURES - Reports on amounts of waste disposed at site. Also includes break down between residential and commercial wastes.

## TITLE SEARCH

## WITNESSES

\* Does not include files on specific parties, see attached lists.



**COMPANIES WITH FILES WITHOUT RFIs**

CONTROL DATA CORPORATION

HB FULLER

HOLM & OLSON

INDUSTRIAL STEEL CONTAINER

MACGILLIS & GIBB

NORTH STAR STEEL

NSP

PILLSBURY

SPERRY/UNIVAC

VIKING TOOL

## PIG'S EYE DUMP-REVIEW

- \* Ordinance for operation of Dump adopted on July 11, 1956. Evidence indicates that Dump may not have been in operation until approximately July, 1957. City of St. Paul memo states that site was flooded in June, 1957 and unable to operate. Memo in September, 1957 states that Pigs Eye site has been operating for several weeks.
- \* Operated until July 1, 1972. MPCA would not issue a permit because site was in a flood plain.
- \* Site consists of approximately 320 acres.
- \* Site served more than 85% of St. Paul and southern suburbs. Wastes from the following communities and from residents in the following communities have been identified: St. Paul, Arden Hills, Falcon Heights, Lauderdale, Little Canada, Maplewood, New Brighton, Roseville, St. Anthony, White Bear Lake, White Bear Township, West St. Paul, South St. Paul, Minneapolis, Anoka, Newport, St. Paul Park, Mendota Heights, North St. Paul, Sunfish Lake
- \* Residential, industrial, and commercial wastes were brought to site.
- \* Site is currently owned by St. Paul Port Authority, Metropolitan Waste Control Commission (MWCC), and CME Real Estate.
- \* In December 1977, MWCC was permitted to dispose of sewage sludge ash on 31 acres of site. Permit was renewed in 1979 and 1985. Approximately 435,000 cubic yards of ash disposed at site.
- \* MWCC possibly dumped sewage sludge on the site during the early 70's.
- \* There were numerous fires at the dump during its years of operation. The site burned intermittently in Summer 1988 for two months.
- \* Site was divided into three areas: North contained demolition wastes; Central was fenced in and contained 3M wastes; South contained household wastes and Ford Motor Company wastes.
- \* There is currently a wood chipping facility on the site which is operated by the City of St. Paul.
- \* In 1961, the St. Paul City Council closed dump to nonresidents unless arrangements were made with either the Council or a private hauler. Haulers were asked to identify nonresidents stops.
- \* In 1964, burning is stopped at the site.

- \* In 1966, City of St. Paul is notified by the Minnesota Health Department on problems with the dump.
- \* In 1967, City begins to charge fee for dump usage. MPCA notifies the City about problems with the site.
- \* In 1957, 1965, 1969, and 1993, the site was under water as a result of flooding.
- \* In 1971, 1,375 tons of waste dumped at the site per day. 25-30% demolition wastes and trees; 25% earth, concrete, and other noncombustibles; 10% cellulosic wastes like 3M; 2% City garbage; and 30% street waste, ashes, tin cans, and furniture.
- \* In 1957, 1200 truckloads daily of industrial and commercial wastes.
- \* Site was for haulers and city predominately. Individuals went to Fish Hatchery dump which was located nearby.
- \* MPCA has lists of haulers who were licensed during the site years of operation.
- \* MPCA has list of former dump employees and has identified persons still available.
- \* MPCA has summaries which detail amounts of waste from charitable groups, parks, public works, garbage, and commercial haulers.
- \* The City of St. Paul Police Department buried chemicals, explosives, and ammunition at the Site.
- \* The following are the annual totals for yards paid for refuse at the Site. These amounts excluded charitable organizations, parks, public works, and garbage.

1967	832,899
1968	1,140,032
1969	1,300,407
1970	1,557,949
1971	1,662,388
1972	492,932

**MPCA PRP ACTIVITIES TO DATE**

- \* Issued 29 Requests for Information
- \* Reviewed MPCA records, including all of GWSW records
- \* Conducted site visits
- \* Reviewed City of St. Paul records and copied pertinent information
- \* Reviewed materials available at Minnesota Historical Society
- \* Conducted witness interviews
- \* Contact U of M Wilson Library for photographs
- \* Review aerial photographs available through MN/DOT
- \* Gather and review manufacturers lists for PRPs

## RECORD COLLECTION

## RESEARCH TO COMPLETE

## MPCA RECORDS

Review MPCA AS files which have been sent to the State Records Center. According to reference at Minnesota Historical Society, MPCA kept files, photographs, and other documents from 1963 to 1976 on the Pigs Eye area. Contact Pat Kiesling 612/296-7797.

Review MPCA SW records which have been sent to State Records Center. Contact Chris Johnson 612/296-7332.

Review MPCA GWSW Industry files for specific parties, including but not limited to 3M, Ford Motor Company, Whirlpool, North Star Steel, and American Can. Note there are several files on the 3M Chemolite plant. Possibly tons of waste from this facility were disposed at Pigs Eye. Contact Chris Malec 612/297-5177.

Talk to Dave Douglas, (612/296-7818) MPCA project manager on 3M Chemolite site for information.

Review MPCA GWSW Miscellaneous files, including file on Pigs Eye Sewage Treatment Plant. Contact Chris Malec 612/297-5177.

Check into possible information in MPCA Tanks and Spills Division. Contact Rebecca Lofgren 612/297-8575.

There is a lot of PRP information contained in MPCA GWSW St. Paul, City of files (C) and (D). Contact Chris Malec 612/297-5177. Orange tabs highlight certain documents.

## HISTORICAL SOCIETY

Review MPCA files on proposed coal terminal in Pigs Eye area. In State Archives, five boxes.

Look for other MPCA records.

Look in both card catalog and photographs catalog under the following headings: St. Paul, Battle Creek; Mississippi River, and names of possible generators.

Look at Sanborn maps, newspapers, old phone books and directories.

## METROPOLITAN COUNCIL

Review photographs of the area.

Get copy of Metropolitan InterCounty Council Developing the Marketing Potential of Hazardous

Waste Reclamation in the Twin Cities Metropolitan Area, June, 1975.

#### STATE RECORDS CENTER

Review the following files: 3M Chemolite files, 1972 and 1972-1982, Lot 88-262, Box 1; Industrial project files, 1950-1981, including Chemolite information, Lot 84-90, Box 11. Also review files referenced in research discussed above.

#### ARMY CORPS OF ENGINEERS

Review aerial photographs. Review information on area dredging. Research other information available. Contact Librarian.

#### WILSON LIBRARY

Review historical photographs of the area. Contact Brett Wilson 612/624-4549.

#### MINNESOTA DEPARTMENT OF NATURAL RESOURCES

Review photographs of area. Research other information available. Note: DNR has property next to Site.

#### CITY OF ST. PAUL

May wish to review several boxes of documents pertaining to the site. MPCA staff have already reviewed these documents and copied pertinent information. To date no operating records detailing who use site have been located. May wish to review maps which have been placed on microfilmed. Contact Rick Person at City of St. Paul Solid Waste Office 612/292-6122. Contact Police Department, information states that Police buried ammunition, explosives, and chemicals at site. Also, contact Fire Department for information since there were fires at the site on a regular basis.

#### RAMSEY COUNTY

Although the site was operated by the City of St. Paul, it was located in Ramsey County and it may have information.

#### DISTRICT COURT

Staff is aware of a least one lawsuit involving the site. Records should be check to determine if additional information is available.

## MINNESOTA HISTORICAL SOCIETY RESEARCH

Russell Sussag besides being a U of M professor who studied the pigs eye area and 3M employee, was also the chair of the Sewer Board.

There was a proposed coal terminal at Pigs Eye. MPCA WQ put in state archives five boxes of documents containing photos, environmental impact statements, statements, and findings. Files from 1963-1976. Parts of files were retained by MPCA in the person of Dale E. McMichael.

WW treatment plant at pigs eye was constructed in 1937. Secondary treatment was constructed in 1966.

Port Authority was started in 1929.

Picture of area in 1969 flooded-QC2.2d p47

Picture of area in 1969 not flooded-MR2.9 SPIn p22

Aerial picture 1936 MR2.9 SP1j p40-41

Picture of area before dump 1956 MR2.9 SP1m p27

File of photos on WW treatment plant construction 1937 HD6.5 r 34-47

Pictures of WW treatment plant buildings MR2.9 SP 8 p176,p297

Booklet on waste water treatment and how it is affected by federal laws. Discusses pigs eye plant and ash disposal. TD525.M6 M538 1969

Metro Council report on waste disposal. Hired consultant. Where are findings? TD 791 T9 M4 1968

Draft EIS for Coal terminal. HF633.M62 S347 Done by St. Paul Port Authority. Discusses water in Pigs Eye Lake and Battle Creek.

Background report on area back to 1700's. F613.S68 B333 1980

## HAULERS

MPCA has copies of licensed hauler lists from 1959 to 1973.

MPCA GWSW General Files, St. Paul, City of (B): includes a survey of haulers from 1970. Haulers are asked to identify number of residential and business customers. One could use this list to identify haulers with business customers.

Limited number of haulers have been contacted previously with a Request for Information.



## NOTES FROM GWSW ST. PAUL & RAMSEY COUNTY FILE RESEARCH

Area across from Capitol Supply on Lafayette Road (up hill from MPCA) has been used by the City of St. Paul to disposed of street sweepings. An analysis from the street sweepings indicate metals. The sweepings were disposed at site when it was opened.

Space Center had 17 trucks and two customers; 16 for 3M waste and one for American Can.

Fish Hatchery Dump closed on March 13, 1971.

Pigs Eye dump in 1971 received 5000 cubic yards daily. Amount was expected to go up because of the ban on backyard burning.

70 acres were filled in on Pigs Eye between 1960-1964.

### ITEMS TO CHECK INTO FURTHER

Metropolitan Council required that landfills in seven county metro area be opened to all within that seven county area. Did St. Paul allow nonresidents to dump again in Pigs Eye?

Waste Water Treatment Plant dumped solid waste, bar screenings, and grit on the site in 1973.

Industrial Steel Co. reconditioned barrels it received from 3M. Barrels containing solvents were accumulated and sent back to the 3M Chemolite plant for incineration. Waste Control picked up the ash. Where did ash go then?

There is evidence of industrial waste going down the sewers at the time the ash and/or sludge was placed on the site.

## POSSIBLE GENERATORS

### FORD MOTOR

In 1973 haul the following to a landfill: 58,000 gallons a year of paint sludge and 1,330 55 gallon drums a year of grease oils, and solvents. Hauler was WCI. Where did waste go from 1956 to 1972?

### HB FULLER

Each month it generates ten drums of dirty solvent. Letter in 1971 asks where to dispose of it. MPCA recommended Pollution Control if recover and recycle was not possible. Where was it disposed of before that.

### CONTROL DATA

In 1972 hauler was Gallagher's Service. Hauled 55 gallons drums of toxic waste. Where did material go before WDE?

### SPERRY

In 1974 Sperry requested information from MPCA on how to dispose of hazardous wastes. Its wastes includes acids, oils, fluxes, alcohol, and solvents. Where did wastes go between 1956-1972?

### 3M

Lots of waste from Hastings, St. Paul, and Chemolite plants.

### INDUSTRIAL STEEL CONTAINER

Took barrels in from 3M. Where did waste in barrels go before 1972? Also shot peen dust from company contains heavy metals. Waste to site?

### PILLSBURY

Company had a terminal close to site, on Red Rock Road. Evidently there were questionable loading and storing practices in the past of fertilizers and salts. Also stockpiled coal at site.

### METROPOLITAN WASTE CONTROL COMMISSION

Evidence of sewage and or sludge on site. Also disposed of ash on site.

### NORTH STAR STEEL

Deposited metal slag material containing iron, magnesium, and calcium oxides into water along Red Rock Road. Also disposing of shredded car bodies. What else were they dumping in area?

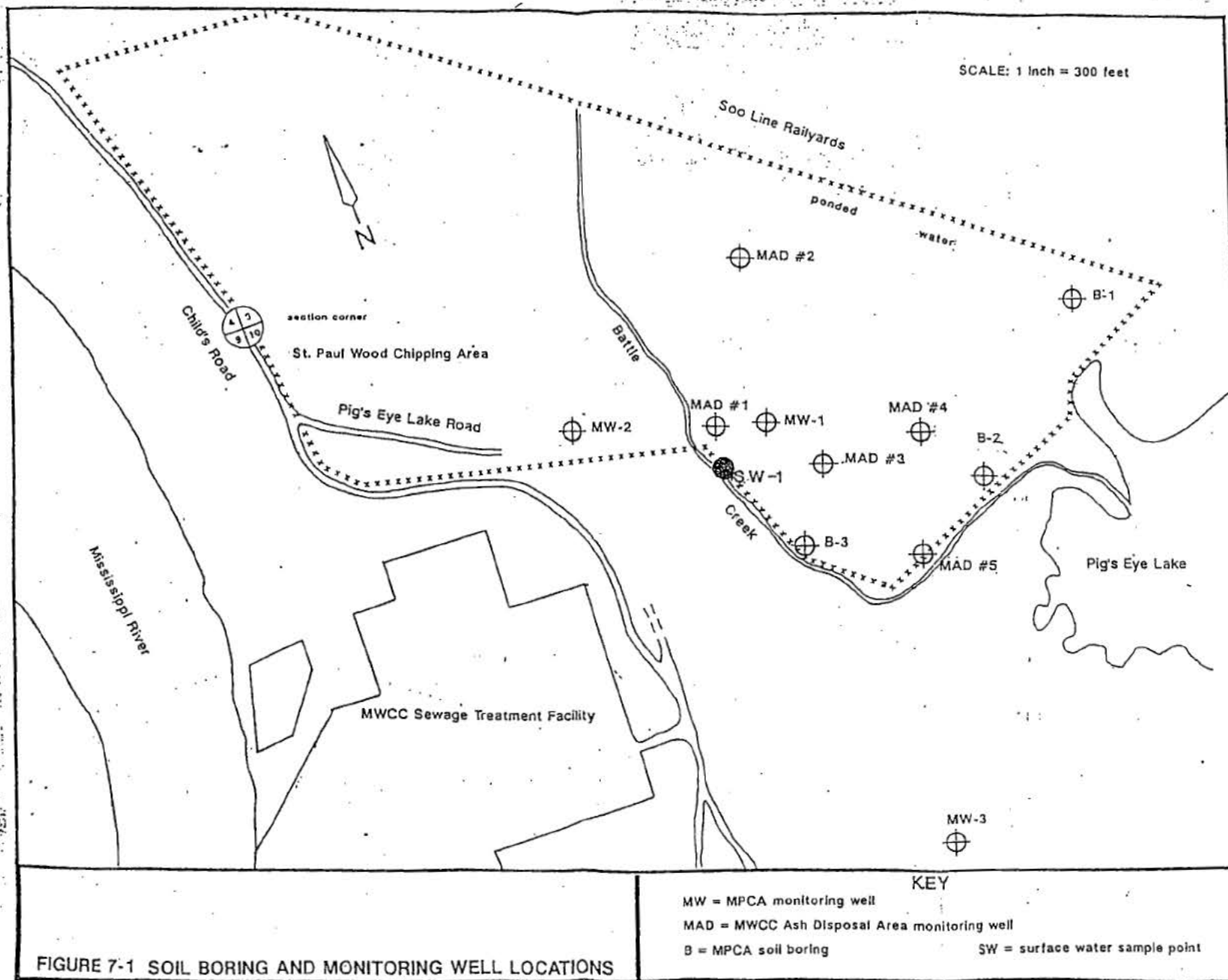
### CITY OF ST. PAUL

Brought street sweepings to the site. Analysis from 1985 indicates heavy metals.

AMERICAN MEDICAL SYSTEMS  
NORTHWEST CONTAINER  
HONEYWELL  
CHAMPION  
TAPE MARK  
BROWN AND BIGELOW  
MGK  
ECOLAB  
DONALDSON COMPANY

**POSSIBLE GENERATORS**

WEST PUBLISHING  
WEBB PUBLISHING  
HONEYWELL  
INTERNATIONAL PAPER  
LAND O LAKES  
MID AMERICA  
COCO COLA  
TRANSILWRAP  
UNISYS  
VILLAME INDUSTRIES  
UNION CARBIDE  
JACKS MANUFACTURING  
ELM CORPORATION  
MAC GILLS GIBBS  
WOLKERSTORFER  
POLAR PLASTICS  
NEW PORT WOOD PRODUCTS  
CONWED PLASTICS  
MINNESOTA FLEXIBLE CORPORATION  
GLOBE PUBLISHING  
INTER CITY PRINTING  
SOUTH PARK CORPORATION  
E K QUEHL PRINTING  
MID WEST PLASTICS  
SINCLAIR & VALENTINE  
TAPEMARK  
ATR ELECTRONICS  
ECOWATER SYSTEMS  
VANCE PUBLISHING  
NORRIS CREAMERS



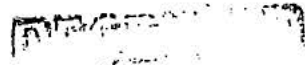
1074

St. Paul files

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File  
ST. Paul

02387



JUL 30 1973

MINN. POLLUTION  
CONTROL AGENCY

Automotive Assembly Division  
Ford Motor Company

Twin Cities Assembly Plant  
966 South Mississippi River Blvd.  
St. Paul, Minnesota 55116

July 27, 1973

Mr. John C. Lichter, Engineer  
Section of Enforcement  
Division of Solid Waste

Subject: Disposal of Paint Sludge and Solvents

Dear Sir:

In answer to your memo of July 12, 1973, we advise as follows:

We are not aware of any instance whereby we are disposing of industrial process wastes improperly. All such materials are collected and hauled away by our contractor, Waste Control, Incorporated, who operates under Permit #SW28, issued by Division of Solid Waste, Minnesota Pollution Control Agency.

The issuance of such a permit is conditioned upon his being an approved contractor, hauling to an approved land fill dump site.

The quantity of materials being disposed of in this manner are as follows:

- Approximately 58,000 gallons/year of paint sludge - hauled in a 500 gallon tank truck.
- 1330 - 55 gallon drums/year - of waste, grease, oils, solvents, etc. collected from various plant operations.

We trust this will provide you with the necessary information.

Very truly yours,

*C. J. Stofko*  
C. J. Stofko  
Plant Manager

/smd



Office of the General Counsel

Ford Motor Company  
Parklane Towers West, Suite 401  
One Parklane Boulevard  
Dearborn, Michigan 48126

February 11, 1991

Art Dunn  
Chief of Solid Waste Section  
Ground Water and Solid Waste Division  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, Minnesota 55155

Subject: Pig's Eye Dump/ Fish Hatcheries Dump  
Ramsey County, Minnesota

Dear Mr. Dunn,

Pursuant to Minnesota Statute §13.03 et seq., Ford Motor Company hereby requests disclosure of the documents described below:

1. Copies of any documents indicating a connection between Ford Motor Company and the Pig's Eye Dump/ Fish Hatcheries Dump, Ramsey County, Minnesota.
2. Copies of any documents providing waste-in or other allocation information regarding the Site.
3. Copies of any studies or technical documents indicating the nature and extent of contamination at the Site.
4. Copies of any documents providing information about any costs incurred to date as a result of any study, cleanup, or other removal or remedial action taken at the Site.

The term "documents" as used herein includes, without limitation by reason of enumeration, all documents, correspondence, photographs, memoranda, reports, notes and writings of any kind.

Ford Motor Company will pay copying charges associated with this request as required by law. Please feel free to contact me

EEB  
157  
MPCA, Ground Water  
& Solid Waste Div.

TYPE n FOR NEXT RECORD. TYP

Esc for Attention, Home to Switch

Capture Off

Applicati

LUMINA SEARCH REQUEST: S=CHEMICALS -DICTIONARIES  
CATALOG RECORD -- NO. 23 OF 38 ENTRIES FOUND

Gardner, William, d. 1943.

Chemical synonyms and trade names : a dictionary and commercial handbook containing over 35,500 definitions / by William Gardner. -- 8th ed., rev. and enl. / by Edward I. Cooke and Richard W. I. Cooke. -- Oxford : Technical Press, c1978.

769 p. ; 25 cm.

Eighth ed. has title: Handbook of Chemical synonyms and trade names.

Includes index.

SUBJECT HEADINGS (Library of Congress; use s= ):

Chemicals--Dictionaries.

Chemicals--Trade-marks.

LOCATION: ST PAUL CENTRAL Ref

CALL NUMBER: 540.3 G177 1978

FOR ANOTHER COPY AT THIS OR ANOTHER LOCATION, press ENTER

TYPE n FOR NEXT RECORD. TYPE i FOR INDEX, g FOR GUIDE.

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Applicati

LUMINA SEARCH REQUEST: S=CHEMICALS -DICTIONARIES  
CATALOG RECORD -- NO. 23 OF 38 ENTRIES FOUND (CONTINUED)

Gardner, William, d. 1943. Chemical synonyms and trade names ... c1978.  
(CONTINUED)

LOCATION: WALTER SCI/ENG Ref

CALL NUMBER: TP9 .G28 1978

TO SEE BEGINNING OF THIS RECORD, press ENTER

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TYPE h FOR HELP, e FOR INTRODUCTORY SCREEN, OR r TO REVISE.

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Office of the General Counsel

Ford Motor Company  
Parklane Towers West, Suite 401  
One Parklane Boulevard  
Dearborn, Michigan 48126

February 28, 1991

VIA FACSIMILE AND FEDERAL EXPRESS

Ms. Cathy O'Connell  
Superfund Unit  
Site Response Section  
Ground Water and Solid Waste Division  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, Minnesota 55155-3898

RECEIVED

MAR 04 91

MPCA, Ground Water  
& Solid Waste Div

Subject: Pig's Eye/Fish Hatcheries Dump  
Requirement to Provide Information

Dear Ms. O'Connell,

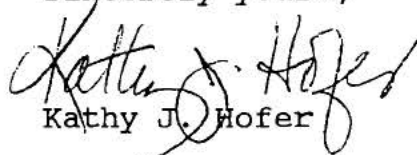
Ford Motor Company's response to the Minnesota Pollution Control Agency's ("MPCA") Requirement to Provide Information regarding the Pig's Eye/Fish Hatcheries site is enclosed. It is the policy of Ford Motor Company to cooperate with all applicable environmental laws.

Please direct all further communication concerning this Site to me at the following address:

Kathy J. Hofer  
Ford Motor Company  
Office of the General Counsel  
Suite 401, Parklane Towers West  
One Parklane Boulevard  
Dearborn, Michigan 48126

I may also be reached by telephone at (313) 594-1687 or by facsimile transmission at (313) 390-3083. Please feel free to call me if you have any questions regarding Ford's response to the Requirement to Provide Information.

Sincerely yours,

  
Kathy J. Hofer

- 2 -

h. The Requirement purports to require responses based upon information and documents outside the custody and control of Ford Motor Company.

i. The definitions of "Ford Motor Company," "You," and "business" are overly broad and seek to impose obligations which are unduly burdensome and oppressive and not authorized by MERLA or CERCLA.

j. The definition of "document" is overly broad and seeks to impose obligations which are unduly burdensome and oppressive and not authorized by MERLA or CERCLA.

k. The definitions of "IDENTIFY/Individual"; "IDENTIFY/Business"; and "IDENTIFY/Document" are overly broad and seek to impose obligations which are unduly burdensome and oppressive and not authorized by MERLA or CERCLA.

l. The Requirement seeks information protected from disclosure by the attorney-client privilege and the attorney work product doctrine, including but not limited to the identification of all persons or other sources of information consulted in the preparation of the answer, and all documents consulted, examined, or referred to in the preparation of the answer.

m. The Requirement purports to require the notarized signature of a Company official or representative that there has been a diligent search for records relevant to the questionnaire and a diligent interview process with present and former employees, a requirement not authorized by MERLA or CERCLA.

n. The Requirement purports to require that information based on personal knowledge be submitted in the form of notarized affidavits, a requirement not authorized by MERLA or CERCLA.

o. The Requirement purports to require the identification of the date of disposal of any documents requested which may have been disposed of, and therefore is overly broad and seeks to impose obligations which are unduly burdensome and oppressive and not authorized by MERLA or CERCLA.

Without waiving or in any way limiting any objection which it has or may have, Ford makes the following response to the Requirement, based upon a reasonable investigation and document search limited to the Ford Twin Cities Assembly Plant, St. Paul, Minnesota, the facility to which the Requirement was addressed, and limited to the time period of 1956 to 1972, the time period referenced in the Requirement:

#### Part I

1. Ford Motor Company.
2. Yes.

Part II

1. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, to the extent that it requests information not relevant to the subject matter of the Requirement. Without waiving or in any way limiting any objection it has or may have, Ford responds that there are many departments within Ford that are responsible for compliance with environmental requirements, including Ford's Environmental Quality Office.

2. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, to the extent that it requests information not relevant to the subject matter of the Requirement. Without waiving or in any way limiting any objection it has or may have, Ford responds that there are many employees within Ford responsible for implementing the environmental programs of Ford. At Ford's Twin Cities Assembly Plant, Mr. John Kallaus is the Environmental Engineer and Mr. R. W. Johnson is the Manufacturing Engineering Manager, and they are two of the persons responsible for implementing Ford's environmental programs.

3. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, in that it requests information not relevant to the subject matter of the Requirement. Without waiving or in any way limiting any objection it has or may have, Ford responds that it holds numerous environmental permits issued by various governmental authorities.

4. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, in that it requests information not relevant to the subject matter of the Requirement.

5. See response to Part II, No. 4.

6. See response to Part II, Nos. 4 and 5.

7. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, to the extent that it requests information not relevant to the subject matter of the Requirement. Without waiving or in any way limiting any objection Ford has or may have, Ford responds as follows:

a. The plant has generated the following wastes:

-- Paint sludges comprised of the following:

1950-1958	20J-Soya Alkyd, Melamine Resins
1958-1960	25J-Soya Coconut Alkyd, Melamine Resins
1960-1972	30J-Coconut Alkyd, Melamine Resins

Incorporated apparently used other disposal locations after that time.

f. See response to Part II, No. 7(e).

8. Ford has not located any information that would indicate that it hauled any material to the site or to any designated disposal area at the site.

9. Yes. See response to Part II, No. 7(a).

10. Ford has not located sufficient information to enable it to determine the chemical composition or the total amounts of waste, if any, generated by Ford and disposed of at the Pig's Eye/Fish Hatcheries Dump.

11. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, in that it requests information not relevant to the subject matter of the Requirement.

12. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, in that it requests information not relevant to the subject matter of the Requirement, and as calling for a legal conclusion.

13. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, in that it requests information not relevant to the subject matter of the Requirement. Ford also objects to the request as vague and ambiguous in that Question 9 does not request information dealing with subcontractors.

14. Ford objects to this request as overly broad, unduly burdensome, and not authorized by MERLA or CERCLA, to the extent that it requests information not relevant to the subject matter of the Requirement. Without waiving or in any way limiting any objection Ford has or may have, Ford responds that during the relevant period Waste Control Incorporated (formerly called Twin City Waste Control) hauled wastes from the Twin Cities Assembly Plant.

15. See response to Part II, Nos. 7 and 14.

16. Ford objects to this request as overly broad and unduly burdensome and on the grounds that it seeks information protected from disclosure by the attorney-client privilege and the attorney work product doctrine. These responses are the corporate responses of the Ford Motor Company based upon information obtained from its employees and records under the direction of its attorneys.

17. Mr. Ron Roth of Waste Control Incorporated may have information relevant to this request.



Office of the General Counsel  
Environmental Law

Ford Motor Company  
Parklane Towers West, Suite 401  
One Parklane Boulevard  
Dearborn, Michigan 48126

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FACSIMILE TRANSMITTAL SHEET

Transmitting from: Pitney Bowes 8050 Facsimile  
Phone Number: (313) 390-3083

Date: 2-28-91

DELIVER TO: Cathy O'Connell

Telephone No.: \_\_\_\_\_

Number of sheets transmitted (including this one): 9

			<u>Phone</u>
FROM:		Robert E. Costello	(313) 322-1966
	<u>X</u>	Robin D. Couch	(313) 390-1878
		Mark D. Edie	(313) 390-1874
		Michelle D. Erikainen	(313) 594-1747
		Timothy A. Green	(313) 390-1875
		Kathy J. Hofer	(313) 594-1687
		George Kircos	(313) 390-1877
		Eileen A. Martin	(313) 390-1876
		Sharon A. Mermuys	(313) 594-1656
		John R. Phillips	(313) 322-4891
		Rolf W. Quisling	(313) 322-1941
			(313) _____

If you do not receive all pages, please contact:

<u>X</u>	Linda J. Donovan	(313) 322-4892
	Susan J. Endreszl	(313) 322-1941
	Barbara A. Greenlee	(313) 390-1875

REMARKS: \_\_\_\_\_



Office of the General Counsel

Ford Motor Company  
Parklane Towers West, Suite 401  
One Parklane Boulevard  
Dearborn, Michigan 48126

February 28, 1991

VIA FACSIMILE AND FEDERAL EXPRESS

Ms. Cathy O'Connell  
Superfund Unit  
Site Response Section  
Ground Water and Solid Waste Division  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, Minnesota 55155-3898

Subject: Pig's Eye/Fish Hatcheries Dump  
Requirement to Provide Information

Dear Ms. O'Connell,

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Sincerely yours,

A handwritten signature in cursive script that reads "Kathy J. Hofer".  
Kathy J. Hofer

02403



Office of the General Counsel  
Environmental Law

Ford Motor Company  
Parklane Towers West, Suite 401  
One Parklane Boulevard  
Dearborn, Michigan 48126

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	<u>      </u>	Sharon A. Mermuys	(313) 594-1656
	<u>      </u>	John R. Phillips	(313) 322-4891
	<u>      </u>	Rolf W. Quisling	(313) 322-1941
	<u>      </u>		(313) _____

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<u>      </u>	Barbara A. Greenlee	(313) 390-1875

REMARKS: \_\_\_\_\_



Office of the General Counsel

Ford Motor Company  
Parklane Towers West, Suite 401  
One Parklane Boulevard  
Dearborn, Michigan 48126

February 28, 1991

VIA FACSIMILE AND FEDERAL EXPRESS

Ms. Cathy O'Connell  
Superfund Unit  
Site Response Section  
Ground Water and Solid Waste Division  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, Minnesota 55155-3898

Subject: Pig's Eye/Fish Hatcheries Dump  
Requirement to Provide Information

Dear Ms. O'Connell,

Ford Motor Company's response to the Minnesota Pollution Control Agency's ("MPCA") Requirement to Provide Information regarding the Pig's Eye/Fish Hatcheries site is enclosed. It is the policy of Ford Motor Company to cooperate with all applicable environmental laws.

Please direct all further communication concerning this Site to me at the following address:

Kathy J. Hofer  
Ford Motor Company  
Office of the General Counsel  
Suite 401, Parklane Towers West  
One Parklane Boulevard  
Dearborn, Michigan 48126

I may also be reached by telephone at (313) 594-1687 or by facsimile transmission at (313) 390-3083. Please feel free to call me if you have any questions regarding Ford's response to the Requirement to Provide Information.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Kathy J. Hofer", written over a printed name.  
Kathy J. Hofer



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h. The Requirement purports to require responses based upon information and documents outside the custody and control of Ford Motor Company.

i. The definitions of "Ford Motor Company," "You," and "business" are overly broad and seek to impose obligations which are unduly burdensome and oppressive and not authorized by MERLA or CERCLA.

j. The definition of "document" is overly broad and seeks to impose obligations which are unduly burdensome and oppressive and not authorized by MERLA or CERCLA.

k. The definitions of "IDENTIFY/Individual"; "IDENTIFY/Business"; and "IDENTIFY/Document" are overly broad and seek to impose obligations which are unduly burdensome and oppressive and not authorized by MERLA or CERCLA.

l. The Requirement seeks information protected from disclosure by the attorney-client privilege and the attorney work product doctrine, including but not limited to the identification of all persons or other sources of information consulted in the preparation of the answer, and all documents consulted, examined, or referred to in the preparation of the answer.

m. The Requirement purports to require the notarized signature of a Company official or representative that there has been a diligent search for records relevant to the questionnaire and a diligent interview process with present and former employees, a requirement not authorized by MERLA or CERCLA.

n. The Requirement purports to require that information based on personal knowledge be submitted in the form of notarized affidavits, a requirement not authorized by MERLA or CERCLA.

o. The Requirement purports to require the identification of the date of disposal of any documents requested which may have been disposed of, and therefore is overly broad and seeks to impose obligations which are unduly burdensome and oppressive and not authorized by MERLA or CERCLA.

Without waiving or in any way limiting any objection which it has or may have, Ford makes the following response to the Requirement, based upon a reasonable investigation and document search limited to the Ford Twin Cities Assembly Plant, St. Paul, Minnesota, the facility to which the Requirement was addressed, and limited to the time period of 1956 to 1972, the time period referenced in the Requirement:

Part I

1. Ford Motor Company.

2. Yes.

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Part II

1. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, to the extent that it requests information not relevant to the subject matter of the Requirement. Without waiving or in any way limiting any objection it has or may have, Ford responds that there are many departments within Ford that are responsible for compliance with environmental requirements, including Ford's Environmental Quality Office.

2. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, to the extent that it requests information not relevant to the subject matter of the Requirement. Without waiving or in any way limiting any objection it has or may have, Ford responds that there are many employees within Ford responsible for implementing the environmental programs of Ford. At Ford's Twin Cities Assembly Plant, Mr. John Kallaus is the Environmental Engineer and Mr. R. W. Johnson is the Manufacturing Engineering Manager, and they are two of the persons responsible for implementing Ford's environmental programs.

3. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, in that it requests information not relevant to the subject matter of the Requirement. Without waiving or in any way limiting any objection it has or may have, Ford responds that it holds numerous environmental permits issued by various governmental authorities.

4. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, in that it requests information not relevant to the subject matter of the Requirement.

5. See response to Part II, No. 4.

6. See response to Part II, Nos. 4 and 5.

7. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, to the extent that it requests information not relevant to the subject matter of the Requirement. Without waiving or in any way limiting any objection Ford has or may have, Ford responds as follows:

a. The plant has generated the following wastes:

-- Paint sludges comprised of the following:

1950-1958	20J-Soya Alkyd, Melamine Resins
1958-1960	25J-Soya Coconut Alkyd, Melamine Resins
1960-1972	30J-Coconut Alkyd, Melamine Resins

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Incorporated apparently used other disposal locations after that time.

f. See response to Part II, No. 7(e).

8. Ford has not located any information that would indicate that it hauled any material to the site or to any designated disposal area at the site.

9. Yes. See response to Part II, No. 7(a).

10. Ford has not located sufficient information to enable it to determine the chemical composition or the total amounts of waste, if any, generated by Ford and disposed of at the Pig's Eye/Fish Hatcheries Dump.

11. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, in that it requests information not relevant to the subject matter of the Requirement.

12. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, in that it requests information not relevant to the subject matter of the Requirement, and as calling for a legal conclusion.

13. Ford objects to this request as overly broad, unduly burdensome, irrelevant, and not authorized by MERLA or CERCLA, in that it requests information not relevant to the subject matter of the Requirement. Ford also objects to the request as vague and ambiguous in that Question 9 does not request information dealing with subcontractors.

14. Ford objects to this request as overly broad, unduly burdensome, and not authorized by MERLA or CERCLA, to the extent that it requests information not relevant to the subject matter of the Requirement. Without waiving or in any way limiting any objection Ford has or may have, Ford responds that during the relevant period Waste Control Incorporated (formerly called Twin City Waste Control) hauled wastes from the Twin Cities Assembly Plant.

15. See response to Part II, Nos. 7 and 14.

16. Ford objects to this request as overly broad and unduly burdensome and on the grounds that it seeks information protected from disclosure by the attorney-client privilege and the attorney work product doctrine. These responses are the corporate responses of the Ford Motor Company based upon information obtained from its employees and records under the direction of its attorneys.

17. Mr. Ron Roth of Waste Control Incorporated may have information relevant to this request.

RECEIVED

FEB 11 91

EPA, Ground Water  
Solid Waste Div.

Office of the General Counsel

Ford Motor Company  
Parklane Towers West, Suite 401  
One Parklane Boulevard  
Dearborn, Michigan 48126

February 7, 1991

Ms. Cathy O'Connell  
Superfund Unit  
Site Response Section  
Ground Water and Solid Waste Division  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, Minnesota 55155-3898

Subject: Requirement to Provide Information  
Pig's Eye Dump/Fish Hatcheries Dump

Dear Ms. O'Connell,

Pursuant to my conversation today with Kristen in your office, this is to confirm Ford Motor Company's extension until February 28, 1991 to respond to the Requirement to Provide Information in the above referenced matter.

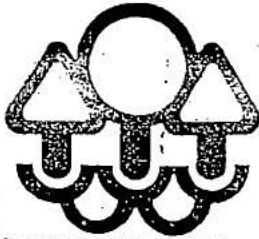
If the above does not accurately reflect our understanding, please contact me at (313) 390-1878.

Sincerely,

A handwritten signature in cursive script that reads "Robin D. Couch".

Robin D. Couch  
Staff Attorney

pieyext.ltr



# Minnesota Pollution Control Agency

520 Lafayette Road, Saint Paul, Minnesota 55155

Telephone (612) 296-6300

02413

*Certificate*  
MINNESOTA 1990

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

January 8, 1991

Mr. John Kallaus  
Ford Motor Company  
966 S. Mississippi River Blvd.  
St. Paul, Minnesota 55166

Dear Mr. Kallaus

RE: Requirement To Provide Information  
Pig's Eye Dump/Fish Hatcheries Dump

Ground Water & Solid Waste Division Site Response Section
<i>Pig's Eye</i> File Name
Sub File Name
Initial

The Minnesota Pollution Control Agency (MPCA) is responsible for implementing the Minnesota Environmental Response and Liability Act (MERLA). MERLA is the cornerstone of the state's efforts to investigate and remedy hazardous waste sites where contamination threatens the public health or the environment.

Pursuant to MERLA, the MPCA staff has identified a release or threatened release of hazardous substances or pollutants or contaminants at the Pig's Eye Dump/Fish Hatcheries Dump, located in Ramsey County, Minnesota. The MPCA staff is in the process of identifying persons who may be responsible for this release or threatened release under MERLA because they arranged for disposal, or transport for disposal, of hazardous waste at the above-referenced site.

The MPCA staff has reason to believe that Ford Motor Company is a responsible person under MERLA, and may have information which is relevant to the release or threatened release for the Pig's Eye Dump/Fish Hatcheries Dump. To facilitate the agency's investigation, the MPCA staff is sending you the enclosed Requirement To Provide Information. As the recipient of this Requirement To Provide Information, you have the legal duty under state law to provide information requested by the MPCA which is relevant to the release or threatened release of hazardous substances or pollutants or contaminants. Information obtained in response to the Requirement To Provide Information will be used by MPCA staff in carrying out their responsibilities under MERLA, including the identification of other responsible persons for the release or threatened release. This is a first Questionnaire; in the future it may be necessary to supplement the information available to MPCA with additional Questionnaires.

Since obtaining this information is an important initial step in the process, your response to the enclosed Questionnaire needs to be submitted within thirty (30) days from the date of the Requirement To Provide Information. The information in your response is vital and will allow us to protect the public health and the environment. Therefore, failure to provide timely, complete and accurate answers to the Questionnaire may result in legal actions by the state of Minnesota to compel disclosure.

STATE OF MINNESOTA  
POLLUTION CONTROL AGENCY

In the Matter of  
Pig's Eye Dump/Fish Hatcheries Dump

REQUIREMENT TO PROVIDE  
INFORMATION PURSUANT TO THE  
MINNESOTA ENVIRONMENTAL  
RESPONSE AND LIABILITY ACT

The Minnesota Pollution Control Agency (MPCA) staff has reason to believe that Ford Motor Company is a responsible person under the Minnesota Environmental Response and Liability Act (MERLA) and may have information which is relevant to the release or threatened release of hazardous substances or pollutants or contaminants from the above-referenced site. You are required by Minnesota Statutes, Section 115B.17, subdivision 3 (1990) to provide information to the MPCA and its employees that is relevant to the release or threatened release:

Any person who the agency has reason to believe is responsible for a release or threatened release as provided in section 115B.03, or who is the owner of real property where the release or threatened release is located or where response action are proposed to be taken, when requested by the agency, or any member, employee or agent thereof who is authorized by the agency, shall furnish to the agency any information which that person may have or may reasonably obtain which is relevant to the release or threatened release.

The federal Comprehensive Environmental Response and Liability Act, Section 104 (e) (1) and (2) also authorizes the MPCA, pursuant to an existing U.S. EPA - MPCA Cooperative Enforcement Agreement, to require responsible persons to furnish such information.

The MPCA is also authorized by Minnesota Statutes, Section 115B.17, subdivision 4(a) (1990) to examine and copy any books, papers, records, memoranda or data of any person who has a duty to provide information under subd. 3.

Questionnaire for Pig's Eye Dump/Fish Hatcheries Dump  
and  
Request for Production of Documents

Part I: ABOUT THE BUSINESS

1. Identify the full legal name of the business.
2. Is the business incorporated?

NOTE: If the answer is YES, answer Questions 3-9 of Part I; If the answer is NO, proceed to Question 9, and answer Questions 9-14 of Part I.

Questions To Be Answered By Corporations:

3. Identify the state or states in which the business is incorporated.
4. When was the business incorporated in each of the above state(s)?
5. Identify the name and address of the corporation's agent for service process who is registered with the Minnesota Secretary of State.
6. Is the business a public or closely held corporation?
7. Identify the names, current addresses and telephone numbers of all directors and officers of the corporation.
8. If the corporation is closely held, identify the names and current addresses and telephone numbers of all shareholders of the corporation.

Questions To Be Answered By Non-Incorporated Business Entities:

9. Is the business either a legal partnership or sole proprietorship? Please specify.
10. If the answer to Question 9 is LEGAL PARTNERSHIP, is the partnership a general or limited partnership?
11. If the business is not a legal partnership or sole proprietorship, please explain the legal organization of the business (for example, joint venture, syndication).
12. How many years has the business been in operation?
13. Identify the names and current addresses and telephone numbers of all current owner(s) of the business.
14. Identify (a) any changes in owners or partners, specifying past owners or partners and their current addresses and telephone numbers; (b) past and current name(s) of the business; and (c) any changes in the location of the business.

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9. Did your company generate any of the following wastes:

acetone	1,2,4-trimethyl benzene
barium compounds	xylene
benzene	zinc compounds
n-butyl alcohol	glycol ethers
ethyl benzene	chlorobenzene
ethylene glycol	methyl ethyl ketone
methyl isobutyl ketone	phenol
phosphoric acid	pentachlorophenol
sulfuric acid	anthracene
1,2 - Diphenylhydrazine	isophorone
carbide abrasives	calcium hydroxide
mercury	ferric Chloride
selenium	silver
lacquer	di-n-Butylphthalate
butylbenaylphalate	paint sludges
plastics	resins
adhesives	varnishes
transformers	transformer fluids
batteries	

Cyanide wastes from cyanide plating solutions, simple cyanide or cyanide baths

Paints containing:

lead  
chromium  
cadmium  
barium  
nickel

Solvents, such as:

methylene chloride  
trichloroethylene  
trichloroethane  
petroleum naphtha  
mineral spirits  
vapor degreasers  
immersion cleaner  
freon

Used oil, such as:

lubricating oil  
gear oil  
cutting oil  
tempering or quenching oils

grease  
transformer fluids  
transmission fluids

Used oil containing heavy metals or PCBs



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and of the insured, amount of coverage under each policy, commencement and expiration data, existence of a "pollution exclusion" clause, and coverage of sudden or nonsudden types of accidents. (In lieu of providing this information, you may submit complete copies of all relevant insurance policies.)

Attachment 1  
Instructions for Questionnaire

1. Enclose with your response to the Questionnaire a notarized affidavit from you or an authorized official representing your business attesting to the fact (a) that a diligent search for records relevant to this Questionnaire has been completed and (b) that a diligent interview process has been conducted with present and former employees who may have knowledge of waste generation or other waste management practices at Pig's Eye Dump/Fish Hatcheries Dump from 1956 to 1972. Any information that you provide in response to the Questionnaire that is based on your personal knowledge, or the personal knowledge of your employees, agents, or other representatives must be submitted in the form of a notarized affidavit.
2. Review the list of definitions in Attachment 2.
3. Make a separate written response to each question. Do not leave any blank questions.
4. Number each of your answers according to the corresponding numbered question. For each document produced in response to the Requirement To Provide Information, identify the number of the question to which it responds on the document or in some other reasonable manner.
5. In answering each question, identify all sources of information consulted in preparing the response.
6. You are required to respond to each question on the basis of any and all information and documents in your possession, custody, or control or the possession, custody or control of your current or former employees, agents, or contractors, or other person who conducted business on your behalf. Furnish information that is available to you regardless of whether it is based on personal knowledge, and regardless of the source.
7. Information necessary to adequately respond to a question may not be known or available on the date your response is submitted. If this is the case, you have a continuing duty to provide the information when it becomes known or available.
8. Respond in writing to each question even if information on which your answer is based has not been recorded in any particular document.
9. If any requested documents have been transferred voluntarily or involuntarily to others or have been otherwise disposed of, identify (a) each document; (b) the person to whom it was transferred; and (c) the date of the transfer or disposal.
10. You have a duty to provide the requested information even if the information may be considered confidential or a trade secret. If you provide any information that related to sales figures, processes or methods of production unique to your business, or information that would tend to affect adversely the competitive position of your business if generally known, you may certify this claim at the time you submit your response and the

Attachment 2  
Definitions for Questionnaire

For the purpose of your answers to the Questionnaire, the following definitions shall apply:

1. FORD MOTOR COMPANY. "Ford Motor Company" includes any agent, subcontractor, or any other person who conducted or did business on behalf of "Ford Motor Company".

2. PIG'S EYE DUMP/FIST HATCHERIES DUMP. "Pig's Eye Dump/Fist Hatcheries Dump" means the property located 1/2 mile southeast of the intersection of Warner Road and Childs Road (an old report lists the address as 1150 Pig's Eye Lake Road), [Ramsey County, Section 10, T28N, R22W] and the property located at the intersection of Warner Road and Childs Road (an old report simply gives the address as Warner Road) [Ramsey County, Section 3, T28N, R22W], St. Paul Minnesota.

3. YOU; BUSINESS. The terms "you" and "business," means the addressee of the Requirement To Provide Information.

4. DOCUMENT. "Document" means information preserved in any manner which is in the possession of or may be reasonably obtained by the addressee, including information in the possession of the addressee's directors, officer, shareholders, partners, managers, employees, subcontractors, trustees, successors, assigns, and agents, regardless of the location of the document or its classification as privileged or confidential. The term "document" includes but is not limited to the following: correspondence, contracts, agreements, memoranda, telegrams, reports, assignment, personnel records, record books, manifests, logs, scrapbooks, diaries, minutes, plans, drawings, photographs, tapes, computer discs, invoices, checks, surveys and analyses.

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(b) Any watercraft of any description, or other artificial contrivance used or capable of being used as a means of transportation on water; or

(c) Any site or area where a hazardous substance, or a pollutant or contaminant, has been deposited, stored, disposed of, or placed, or otherwise come to be located.

"Facility" does not include any consumer product in consumer use.

10. HAZARDOUS SUBSTANCE. "Hazardous substances," as defined in Minnesota Statutes, Section 115B.02, subdivision 8 (1990), means:

(a) Any commercial chemical designated pursuant to the federal Air Pollution Control Act, under United States Code, title 33, section 1321(b)(2)(A);

(b) Any hazardous air pollutant listed pursuant to the Clean Air Act, under United State Code, title 42, section 7412, and

(c) Any hazardous waste.

"Hazardous substance" does not include natural gas, natural gas liquids, liquefied natural gas, synthetic gas usable for fuel, or mixtures of such synthetic gas a natural gas, not does it include petroleum, including crude oil or any fraction thereof which is not otherwise a hazardous waste.

11. HAZARDOUS WASTE. "Hazardous waste," as defined in Minnesota Statutes, Section 115B.02, subdivision 9 (1990) means:

(a) Any hazardous waste as defined in section 116.06, subdivision 13, and any substance identified as a hazardous waste pursuant to rules adopted by the agency under section 116.07; and

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resources, such as silt, dissolved or suspended solids in industrial waste, water effluents or discharges which are point sources subject to permits under section 402 of the Federal Waste Pollution Control Act, as amended, dissolved materials in irrigation return flows; or source, special nuclear, or by-product material as defined by The Atomic Energy Act of 1954, as amended.

14. RELEASE. "Release," as defined in Minnesota Statutes, Section 115B.02, subdivision 15 (1990) means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment which occurred at a point in time or which continues to occur.

"Release" does not include:

(a) Emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, watercraft, or pipeline pumping station engine;

(b) Release of source, by-product, or special nuclear material from a nuclear incident, as those terms are defined in The Atomic Energy Act of 1954, under United States Code, title 42, section 2014, if the release is subject to requirements with respect to financial protection established by the federal nuclear regulatory commission under United States Code, title 42, section 2210.

(c) Release of source, by-product or special nuclear material from any processing site designated pursuant to the Uranium Mill Tailing Radiation Control Act of 1978, under United States Code, title 42, section 7912(a) or 7942(a); or

(d) Any release resulting from the application of fertilizer or agricultural or silvicultural chemicals, or disposal of empties pesticide containers or residues from a pesticide as defined in section 18A.21, subdivision 25.



## PIG'S EYE DUMP

1956           Begin operating

1961           Close dump to nonresidents unless prior arrangements  
              are made with hauler or city council. Haulers are  
              asked to identify nonresident stops.

1964           Burning is stopped.

1966           City of St. Paul is notified by the MN Health Dept.  
              about problems with dump.

1967           City begins to charge fee for dump usage.  
              MPCA notifies City of St. Paul about dump problems.

1972           Dump closes (7/1/72).

NON-RESPONSIVE





## TELEPHONE CALL



From REBECCA FLOOD (ENV. SCI) Tel No 229-2073

Company METRO. WASTE CONTROL COMM City ST. PAUL

Date 8-3-88

Subject PRELIMINARY TESTING OF HAZ. WASTE

REBECCA FLOOD RELATED THE FOLLOWING INFORMATION TO NALT HARRIS  
(MRA/HW ENFORCEMENT) IN REGARD TO PRELIMINARY TESTING ON THE SAMPLES  
TAKEN BY PACE LABS, ON THE MWCL SITE JULY 7, 1988

(I) ACID CARRIAGES: 1 EMPTY, 2 PARTIALS. THE ACID WILL BE TESTED TO  
DETERMINE TYPE AND CONCENTRATION

(II) SOIL: SOIL WILL BE TESTED FOR VOLATILES AND CADMIUM, CHROMIUM  
AND LEAD CONTENT.

(III) DRUM BOTTOM SOLIDS: THESE WILL BE CONSOLIDATED FROM SEVERAL DRUMS  
INTO ONE DRUM. THESE SOLIDS WILL BE TESTED FOR VOLATILES, METALS.

(IV) DRUMS: INITIALLY, MOST OF THE DRUMS CONTAINED AN OIL/WATER MIX. THESE  
DRUMS WILL BE CONSOLIDATED. ADDITIONALLY, THERE WERE TWO DRUMS CONTAINING  
A SOLVENT/WATER MIX, AND ONE DRUM STRAIGHT SOLVENT. THERE WAS ALSO ONE  
DRUM CONTAINING A BROWN NON-OIL LIQUID WITH A PH OF 3.

ANALYSIS WILL BE COMPLETED ON ALL SAMPLES TO DETERMINE THE  
NATURE OF THE MATERIALS. TESTING WILL BE DONE BY PACE LABS, REFERRED  
MR. DARNER

## PIG'S EYE DUMP QUESTIONS

What was your connection with the landfill?

Describe the set up of the landfill?

How were companies wastes or wastes trucks handled?

What businesses used the landfill?

What haulers used their own trucks and drivers to bring loads to the landfill?

Were there haulers who did solely or primarily commercial and industrial refuse collection?

Were certain areas of the landfill used by certain companies or commercial business in general? Can you show these areas on the map?

Was there waste all over landfill? Describe process.

Did companies dump barrels intact or were materials emptied from the barrels?

Did you remember liquid waste being dumped by companies?

Was commercial waste burned at any point in time? Did this change later in time?

Were commercial wastes buried, burned, or both depending on waste?

Were there fires?

Were there floods?

Who do you know of anyone who could provide us with more information?

Do you remember any files or other documentation that was made?

Do you remember any of the following companies using the landfill? If yes, do you remember type of waste, amount, and where the waste was put.

3M	Land O Lakes
Whirlpool	Unisys
Ford	Union Carbide
West Publishing	Anchor Hocking
EMC	Boise Cascade
State of MN	Buckbee Mears
Honeywell	Deluxe
Ecolab	Merrill
Brown & Bigelow	Coco Cola

HB Fuller  
Gillette  
Old Dutch Foods  
Old Home Foods  
Pearson Candies  
Breweries: Schmidt  
Pioneer/Dispatch

Stone Container  
Waldorf

From: MNPCA::MRGATE::"A1::FELLOWS\_N" 12-OCT-1992 11:44:21.11  
To: SMITH\_C  
CC:  
Subj: 3M pigs eye

From: NAME: Nile Fellows  
FUNC: GW Site Response Section  
TEL: (612) 296-7782 <FELLOWS\_N AT A1 AT MNPCA>  
To: NAME: Cheryl Smith <SMITH\_C@mrgate>

Russ Susag? 778-4468 returned my calls concerning Pig's Eye and 3M.

He had no copy of an RFI response, but did have a letter that 3M had sent in response to the RFI. He said he would send me a copy of this letter.

I told Russ that rather than have him answer the old RFI that we would send him out a new questionnaire.

He said he was involved in a research project in 1965 for the U of M at Pig's Eye. He also indicated that we should talk to Kent Shoenberger who was with the City at the time.

Russ also indicated that there have been several floods, 1951, 1965 and 1969. He indicated that after the 1969 flood that burning no longer took place at the site.

*Russell  
Susag*

Ch in to  
Holm + Olson  
greenhouse  
see R.F. file

Beerman Services hauled barrels of sludges  
to Pig's Eye.

Pig's Eye wasn't a permitted landfill - MPCA wouldn't give  
permit.

307 acres. Wood Chipping facility operated by City of St. Paul.

Owned by St. Paul, CME Real Estate, MWCC, St. Paul Port  
Authority

Pig's Eye - operating in 1956. Served more than 70%  
of St. Paul & southern suburbs. Residential, Commercial,  
and industrial wastes. Closed by MPCA in 1973 (July 1st)

Dec. 1977 - MWCC permitted to dispose of sewage sludge ash  
on 31 acres of landfill. Permit was renewed in 1979 & 1985.  
est. 435,000 cubic yards of ash disposed of on site.

Dec 1980, former hauler witnessed 3m dumping 55 gal.  
drums & posting security guards around the  
dumping area. in approx 1970 or 71.

Summer 1988 - Site caught on fire and burned intermittently  
for over two months.

files contain names of two former employees.

Dump was divided into 3 areas - no part was for demolition debris, center portion was land in and used only by 3m, and south portion was household waste. So area also rec'd high aunts. of waste from the motor company.

City of Al. paid for solid waste fees. (the mra solid waste fees)

Fogel & Adams in area

Millerville RR cleared 177 acres  
St. Paul Port Authority - 130 acres.